

Record of Conference and Orders: Vera M. Scanlon, USMJ

Date: 1/11/2016

Case:

Jewels v Casner

Civ. A.

12 - 1895

KAM (VMS)

ECF Recording in 504N:

☐ Telephone Conference☒ In-person Conference

11:50 - 2:30

Counsel: (See separately docket entry or document for specific appearances)☒ Counsel for Plaintiff(s) ☐ Pro Se Plaintiff(s) ☒ Counsel for Defendant(s) ☐ Pro Se Defendant(s)**Conference Type:**☐ Initial Conference ☐ Status Conference ☐ Settlement Conference ☒ Motion Hearing ☐ Discovery Conference ☐ JPTO Conference ☐ Other _____**Further to the conference, discovery and other scheduling dates are as follows:**

(If dates previously set by the Court are not reset, they remain as stated in the previous order.)

☐ Motions decided on the record[112] decided as noted,
granted in part, denied in part☐ Rule 26(a) disclosures, incl. supplements☐ Document requests to be served☐ Interrogatories to be served☐ Amended pleadings, incl. joinder☐ Complaint ☐ Answer☒ Joint status letter ☐ Stip of dismissal to be filed☐ Status conference☐ In person ☐ Telephone (718) 613-2300☐ Specific depositions to be held☐ Fact discovery closes☐ Expert disclosures to be served☐ Initial expert report(s) to be served☐ Rebuttal expert report(s) to be served☐ Expert discovery closes☐ All discovery closes☐ Joint letter confirming discovery is concluded☐ Summary judgment to be initiated☐ Joint pre-trial order to be filed☒ Proposed/Expanded confidentiality order to be filed☐ Consent to Magistrate Judge to be filed☐ Settlement Conference☐ To be served☐ To be filed☐ On consent ☐ By motion ☐ By PMC letter

2/12/16

Date:

Time:

To be organized by:

☐ PMC letter ☐ Briefing☐ Letter for conference ☐ Proposed JPTO

1/22/16

Date:

Time:

Vera M. Scanlon, USMJ
Conference Orders, ContinuedCase: Twels v Caser Civ. A. 12. 1895Date: 1/11/2016Additional Orders:

Ms Kubitschek informed the Court of the recent revelation of a ²⁰⁰⁸ meeting between Concede and Heutshen when the case was transferred.

This revelation upends T's expectation of the possible location / existence of records; T's expectation was based on previous representation by As.

Numerous discovery issues were decided on the record. On or before 1/15/16, counsel will submit a letter as to their respective positions on the applicability of NY Soc. Serv. Law § 372 in this case. See *Stenberg v. Mt. Sinai Medical Center*, 2014 WL 1311572 (E.D.N.Y. 3/31/14), generally.

Vera M. Scanlon, USMJ
Conference Orders, Continued

Case: Jewels v Casner Civ. A. 12-1895

Date: 1/11/2016

Additional Orders:

By 2/12/16, Counsel will submit a joint letter with a detailed revised discovery letter for the conclusion of all discovery by the end of May 2016. The schedule is to address, inter alia, (A) depositions of Ford, Barnum, McCallum, CTA e-mails with knowledge of Concord & Heartshare merger/transition (B) discovery as to the closing of Concord (C) Scope and full review of files of individuals in care at the same time as TT with spare foster parents, (D) various declarations as to complete record searches, (E) scope agreements as to OSI evaluation investigations and need for any redactions, (F) outstanding 30k (G) depositions (H) settlement discussion possibilities. A counsel should discuss with counsel the scope of the relevant insurance policies. Page 3 of 3